

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

A.S., a minor, by his next friends AMY A., mother,
and JEFF S., father; and A.B., a minor, by her next
friends JULIE B., mother, and ROSS B., father,

Plaintiffs,

v.

BILL LEE, in his official capacity as Governor of
Tennessee; HERBERT SLATTERY III, in his official
capacity as Attorney General of Tennessee;
WILSON COUNTY BOARD OF EDUCATION;
JEFF LUTTRELL, in his official capacity as
Director of the Wilson County Schools; and DOES
1–10,

Defendants.

Case No. _____

DECLARATION OF ADAM S. LURIE

I, Adam S. Lurie, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at law licensed to practice in New York, New Jersey, and the District of Columbia and am a Partner and Head of the U.S. Dispute Resolution Practice at the law firm Linklaters LLP, counsel for Plaintiffs in this action.

2. I will be filing a motion to appear in this matter *pro hac vice*.

3. I submit this declaration in support of Plaintiffs’ Motion for a Temporary Restraining Order and a Preliminary Injunction. I make the statements herein of my own personal knowledge and if called upon to testify thereto I could and would so truthfully.

4. Attached hereto as Exhibit A is a true and correct copy of the “Tennessee Accommodations for All Children Act,” 2021 Tenn. Pub. Ch. 452.

5. Attached hereto as Exhibit B is a true and correct copy of Memo #2020-33, from Mickey Hall, Deputy Director of the Wilson County Board of Education, to Dr. Wright and Board Members, dated May 9, 2020, regarding “School Federal Projects Fund FY 2021.”

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2021.

/s/ Adam S. Lurie
Adam S. Lurie

Dated: August 2, 2021

Respectfully submitted,

By: /s/ Tricia Herzfeld
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* Motions for admission *pro hac vice*
forthcoming

*Attorneys for Plaintiffs A.S., a minor, by his
next friends AMY A., mother, and JEFF S.,
father; and A.B., a minor, by her next
friends JULIE B., mother, and ROSS B.,
father*

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of August, 2021 a true and exact copy of the foregoing document has been served via Electronic Mail upon the following:

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/s/ Tricia Herzfeld

Tricia Herzfeld